

Mr. Dewayne Johnson

April 24, 2008

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During preliminary engineering, alternatives will be considered, including: rebuild-as-is, various options of rebuilding to modern design standards, compromises to rebuilding to modern design standards, rebuilding with additional lanes, and rebuilding with the existing number of lanes. Only at the conclusion of the preliminary engineering would a determination be made as to how the freeway would be reconstructed."

City of Milwaukee Common Council Resolution No. 011729 explicitly opposes capacity expansion of I-94 between the Marquette Interchange and the Zoo Interchange while generally supporting design improvements to improve safety if such improvements can be made without excessive community impacts. In light of Resolution No. 011729, DPW supports design improvements of the Zoo Interchange to improve motorist safety while minimizing right-of-way impacts.

If, however, WISDOT proposes capacity expansion of the Zoo Interchange, it is essential that the planning process as described in the regional transportation plan be adhered to. Specifically, it is DPW's expectation that a legitimate alternative analysis be performed that includes both freeway improvements and rapid transit improvements in the context of a regional plan for maintaining mobility of the traveling public. Such alternatives analysis would be expected to be subjected to a full public involvement process and would allow an informed evaluation of alternative infrastructure improvements in achieving broad community goals.

In the event that WISDOT does not propose capacity expansion of the Zoo Interchange, it would be DPW's expectation that the interchange be designed so as not to preclude future implementation of mass transit improvements. Specifically, the regional transportation plan has identified a number of east-west corridors within your project's limits for potential future commuter rail, rapid and express transit routes including a portion of the abandoned CP Rail West Allis Line. It is DPW's goal that this West Allis Line corridor, which runs under the south leg of the Zoo Interchange, be preserved for potential future express or rapid transit routes as well as an important link in the regional bike trail network. Furthermore, Wisconsin Avenue located just north of the Zoo Interchange, has been identified as potential future express transit route in the City of Milwaukee Comprehensive Transit Strategy. It is requested that this potential transit improvement be considered in the design of the Zoo Interchange as well.


Finally, as you know, the West Suburban TIA is essentially completed and it is imperative that the TIA conclusions be considered as a part of the Zoo Interchange design. The existing transportation system will not be able to accommodate the planned development within the County Research Park and Hospital Complex. The Zoo Interchange design team should consider options that would maximize access and mobility to and between the developing areas while minimizing the traffic impacts to the adjacent neighborhoods.

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As the preliminary engineering/environmental analysis phase for reconstruction of the Zoo Interchange progresses and design concepts are developed, DPW will provide further input as necessary. Furthermore, upon finalization of the design for the interchange, DPW will provide input into traffic mitigation strategies to maintain mobility during construction.

We look forward to continued discussions with WISDOT as the design phase progresses on this highly important project.

Very truly yours,



Jeffrey E. Polenske, P.E.  
City Engineer



Jeffrey J. Mantes  
Commissioner of Public Works

MDL:ns

C: Mayor Tom Barrett  
President Willie L. Hines, Jr.  
Alderman Michael J. Murphy  
Alderman Robert Bauman





Department of Public Works  
Infrastructure Services Division

**Jeffrey J. Mantes**  
Commissioner of Public Works

**James P. Purko**  
Director of Operations

**Jeffrey S. Polenske**  
City Engineer

July 3, 2008

Ms. Carrie Cooper  
Wisconsin Department of Transportation  
141 NW Barstow Street  
Waukesha, WI 53187

Subject: Zoo Interchange Reconstruction Project  
Environmental Impact Statement  
Agency Coordination Plan  
Impact Analysis Methodology Document  
Purpose and Need Document  
City of Milwaukee Department of Public Works Review

Dear Ms. Cooper:

The City of Milwaukee Department of Public Works (DPW) has reviewed the Agency Coordination Plan, the Impact Analysis Methodology Document, and the Purpose and Need Document associated with the Zoo Interchange Reconstruction Project Environmental Impact Statement and has the following comments:

**Agency Coordination Plan**

No comment

**Impact Analysis Methodology Document**

According to the document, the Business Impact Methodology will include "an estimate of the number and types of businesses to be displaced, number of employees/jobs affected, any special characteristics, and availability of replacement business sites." Similarly, the Community and Residential Impact Methodology will include an "estimate of the number of homes to be displaced, including family characteristics, availability of comparable decent, safe, and sanitary housing in the area; any measures to be taken when replacement housing is insufficient; and identification of any special relocation needs".

Preliminary plans under the various modernization alternatives suggest significant business and residential right-of-way impacts that potentially could have a dramatic impact on the tax base and economic vitality of the City of Milwaukee. Those properties within the City of Milwaukee that could potentially be impacted amount to over \$18 million in assessed value.

It is requested that the impact methodology identify individual business and residential acquisitions resulting from each specific geometric modification within the modernization alternatives and, to the extent possible, quantify safety, traffic operational, and access improvements resulting from each specific geometric modification. This methodology is necessary to allow decision makers to assess benefits versus impacts of each geometric modification and determine if the modification is justified. Furthermore, given the wide range of potential geometric modifications under the spot improvement alternative and the various modernization alternatives, this methodology would allow decision makers to make recommendations for mix of improvements from each of the alternatives rather than recommending a specific overall alternative.

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The modernization alternatives provide space within the median of the interchange for future capacity expansion. It is requested that the methodology quantify acquisitions directly attributable to future capacity expansion. Specifically, it is requested that Wisconsin Department of Transportation (WISDOT) evaluate design alternatives that incorporate the various geometric improvements but without providing the necessary additional space for future capacity expansion and identify the acquisitions that could be avoided if the space for future capacity expansion is not provided.

The Impact Methodology Document indicates that construction impacts may be assessed and mitigation measures developed as required as they relate to access impacts, economic impacts, noise impacts, water quality impacts, construction waste impacts, vibration impacts, and air quality impacts. In addition to the listed impacts, it is requested that impacts to the Hank Aaron State Trail extension that routes under the south leg of the Zoo Interchange (which was anticipated to be completed during the Zoo Interchange reconstruction Project) be minimized and/or mitigated. If the trail extension cannot be operated safely during reconstruction of the Zoo Interchange, it is requested that WISDOT consider providing an alternate route for this trail during the reconstruction project.


#### **Purpose and Need Document**

The Purpose and Need Document provides the basis from which the interchange alternatives will be evaluated. Because the modernization alternatives propose additional right-of-way for future freeway capacity expansion, it is requested that the report clearly document the need for future capacity expansion. It is requested that the report verify assumptions utilized under previous regional transportation demand modeling efforts that recommended future freeway expansion and perform additional travel demand modeling as necessary if any previous assumptions are not currently or expected to be valid through the anticipated useful life of the interchange. Rapidly changing economic conditions that are currently being experienced, particularly rising fuel prices, have resulted in decreases in vehicle usage and increases in transit mode split throughout the country. Projected future fuel costs have likely increased since the time of regional transportation demand modeling that recommended freeway expansion. As such, it is imperative that previous assumptions are reconsidered so that the Zoo Interchange is not designed for future conditions that may never be realized. It is further requested that the Purpose and Need Document clearly verify the need for any proposed future freeway capacity expansion with a maximized transit system as called for in the Regional Transportation Plan.

Very truly yours,



Jeffrey S. Polenske, P.E.  
City Engineer



Jeffrey J. Mantes  
Commissioner of Public Works

MDL: nas

c: Mayor Tom Barrett  
Alderman Willie L. Hines, Jr.  
Alderman Michael J. Murphy  
Alderman Robert Bauman



## Cooper, Carrie - DOT

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**From:** Charlie.Webb@ch2m.com  
**Sent:** Friday, February 29, 2008 11:06 AM  
**To:** Cooper, Carrie - DOT; Goldsworthy, Benjamin; abubb@kapur-assoc.com  
**Subject:** FW: Zoo Interchange

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**From:** Peter Daniels [mailto:pdaniels@ci.west-allis.wi.us]  
**Sent:** Thursday, February 28, 2008 3:06 PM  
**To:** Webb, Charlie/MKE  
**Cc:** donna.brown@dot.state.wi.us; Heimlich, Brad/MKE  
**Subject:** RE: Zoo Interchange

Charlie,

The City of West Allis would like to be a participating agency for the Zoo Interchange study. We definitely would like the opportunity to comment on the alternatives and other items listed. We understand the responsibilities associated with our request to be a participating agency.

Peter C. Daniels, P.E.  
Principal Engineer  
West Allis Engineering Department  
7525 W. Greenfield Avenue  
West Allis, WI 53214  
Phone: (414) 302-8374  
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E-Mail: pdaniels@ci.west-allis.wi.us

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**From:** Charlie.Webb@CH2M.com [mailto:Charlie.Webb@CH2M.com]  
**Sent:** Thursday, February 28, 2008 10:20 AM  
**To:** pdaniels@ci.west-allis.wi.us  
**Cc:** donna.brown@dot.state.wi.us; brad.heimlich@ch2m.com  
**Subject:** Zoo Interchange

Peter---we spoke last week about WisDOT's invitation to West Allis to become a "participating agency" for the Zoo Interchange study. The purpose of this e-mail is to provide additional information to help you determine whether the City of West Allis would like to be a participating agency. I would be happy to meet to go through this if you like.

For more information regarding Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and the roles of a participating agency please review the following link: <http://www.fhwa.dot.gov/hep/section6002/> (questions 21-29 specifically address participating agencies)

SAFETEA-LU Section 6002 created participating agencies as part of the environmental review process. The intent of the new participating agency category is to encourage governmental agencies at any level with an interest in the proposed project to be active participants in the National Environmental Policy Act (NEPA) evaluation.

WisDOT and FHWA will provide an opportunity for participating agencies to comment on:

- the purpose of the project,
- the range of alternatives considered,
- impact analysis methodology, and
- project schedule

It is incumbent upon the participating agencies to provide timely input. Failure to raise issues in a timely manner may result in these comments not receiving the same consideration that they would have received if raised at the appropriate time. WisDOT and FHWA will typically provide 30 days for participating agencies to provide input, and will strive to give advance notice of when opportunities for input are approaching. Section 6002 clearly spells out that lead agencies (in this case WisDOT and FHWA) need not revisit decisions that have already been made. Also, final decision making rests with the lead agencies. Participating agencies are not asked to concur or approve key decisions, but rather provide input to the lead agencies.

Please let me know via e-mail or letter by March 14 if West Allis would like to be a participating agency.

Thanks,  
Charlie Webb  
414/698-92666